

End of Life Vehicle Solutions Corporation (ELVS)
Mercury Switch Collection Plan
Approved November 5, 2007

The specific requirements detailed in 19-6-1004 will be met through the following components of the Plan:

- 2 (a) The make, model, and year of any vehicle, including current and anticipated future production models, sold by the manufacturer that may contain one or more mercury switches;

Attached with the Plan is a list of vehicles with the potential to contain a mercury switch. Mercury switches were phased out by manufacturers after the 2003 model year and there are no current or future models that contain a mercury switch. This list is under continual review and any updates will be posted on the ELVS website at www.elvsolutions.org.

- 2(b). The description and location of each mercury switch for each make, model, and year of vehicle:

Attached with the Plan are copies of the educational materials that include this information

- 2(c) Education materials that include:

- (i) Safe and environmentally sound methods for mercury switch removal; and
- (ii) Information about hazards related to mercury and the proper handling of mercury;

Education Materials: The following education and training materials, which include information on mercury hazards and handling, will be included with the shipment of collection materials to vehicle recyclers and scrap recycling facilities. A multi-media approach for education and training of the safe and environmentally sound removal of mercury switches from end-of-life vehicles is recommended, including:

- a. A cover letter introducing the program and thanking recyclers and scrap facilities for participating in the program.
- b. A brochure (attached) that identifies why mercury switches should be removed, where they can be found in automobiles, how to properly collect and manage them, and how to contact the administrators of the program should questions arise.
- c. A DVD (enclosed) that provides an overview of automotive mercury collection, and methods of mercury switch removal.
- d. A link to a website (www.elvsolutions.org) that provides an overview and the specifics of the Utah Program and links to other related sites.

- e. Detailed instructions (attached) for shipping the collection containers for recycling of the switches.
- f. A list (attached) of vehicles that may contain mercury convenience light switches and a list of ABS G-Force sensors including removal instructions.
- g. Additionally, ELVS will make these materials available to USHWCB for use in any education or outreach programs they may conduct.

2(d) A method for storage and disposal of the mercury switches, including packaging and shipping of mercury switches to an authorized recycling, storage, or disposal facility;

Mercury Collection and Storage: Upon receipt of a list of Utah vehicle recyclers and scrap recycling facilities (to be identified by the Department), buckets and collection materials will be promptly sent to all facilities on the list. Mercury switches will be stored at the vehicle recyclers and scrap recycling facilities as Universal Waste. The container will include a Universal Waste label. The vehicle recycler or scrap recycling facility is to indicate on the label the date when the first mercury switch is placed in the container ("start date"). Specific instruction will indicate that containers may not be stored on or used at the location beyond one year from the start date indicated by the vehicle recycler or scrap recycling facility. Mercury switches will be stored and shipped in a 3.5 gallon container (other container sizes may be used as well) with a sufficiently tight, sealable lid. The containers are designed to meet the shipping requirements of the Department of Transportation (DOT), the contracted recycler and the carrier selected to transport mercury switches to the recycling facility. ELVS will provide these storage containers at no cost to the program participants. Individual vehicle recyclers should remove automotive mercury switches as explained in the educational materials provided.

- a. Transportation: A recycler whose container is nearly full of mercury switches or who has a container with a retention period that is about to expire under Universal Waste rules will notify the ELVS contractor. The ELVS contractor will ship an empty container to the recycler (at no cost), as well as provide for the transportation of the full container.
- b. Mercury Recovery/Recycling: The ELVS contractor will be responsible for the recovery, recycling and or disposal of mercury collected from automotive mercury switches. All mercury switches will be recycled. In the rare case when the mercury from a switch cannot be recycled the entire assembly will be properly disposed as a hazardous waste.

2(e-f) A procedure for the transfer of information among persons involved with the plan to comply with reporting requirements; and A method to implement and finance the plan, which shall include the prompt reimbursement by the manufacturer of costs incurred by a person removing and collecting mercury switches.

ELVS will:

- a. Contract with a qualified waste manager who will perform the day-to-day operations, maintain all appropriate records. These records will be maintained in a database and made available to the agency upon request. ELVS' present contractor for this program is The Environmental Quality Company (EQ). The point of contact for Utah recyclers is Judie Zaborowski with EQ (734/547-2511).
- b. Submit the Mercury Recovery Plan to USHWCB.
- c. Receive a current list of verified vehicle recyclers and scrap recycling facilities from USHWCB.
- d. Ship the collection containers and educational materials to the vehicle recycler.
- e. Include additional vehicle and scrap recyclers in the program as they are identified throughout program implementation, a collection bucket and educational materials will be sent to them as well. Recyclers can also self-elect participation through the website or phone.
- f. Monitor the progress of the system by reviewing, independently and in conjunction with USHWCB, the number of participants, the amount of mercury collected, and providing reports as required.

Program Costs:

- a. All program costs related to the collection, transportation and recycling of automotive mercury switches from automakers that are members of ELVS will be paid by ELVS.
- b. All bounty payments due to automobile recyclers for switches from automakers who are members of ELVS will be paid by ELVS through their designated contractor.

Bounty Payments

Upon verification of properly recorded Vehicle Identification Numbers (VINS), ELVS will authorize a payment of \$5.00 per convenience light switch collected. Convenience light switches that cannot be directly linked to eligible vehicles through a valid VIN will be subject to a "shake test" to determine if the switch is mercury. If the switch is found to be a mercury switch, ELVS will authorize a payment of \$5.00. Switches that contain a steel ball bearing mechanism rather than mercury will not be authorized for a bounty.

NOTE: The educational material includes information on locating and removing ABS G-Force Sensors, however the Act only includes mercury containing light switches. ELVS will accept ABS G-force sensors in collection buckets and will recycle at no cost to Utah dismantlers; however ELVS will not pay a bounty on ABS G-force sensors. This information will be explained in the bucket materials.

ELVS will, through its contractor, track the following performance measures:

- a. The number of participating vehicle recyclers and scrap recycling facilities, including their contact information.
- b. When collection containers are received at the ELVS contractor by each participant.
- c. The number of mercury switches submitted by each participant.
- d. The total number of mercury switches collected from dismantlers in Utah.
- e. The amount of mercury recovered.

Orphan Switches:

Orphan switches, i.e. ABS G-Force sensors and other switches (non OEM switchers such as after-market remote starters) not covered under Utah law will be recycled however no bounty will be paid.